

## CODE OF CONDUCT

Our culture of responsibility to each other and all our stakeholders demonstrates our commitment to living our values every day.

Our people behave in a manner that upholds and builds our reputation.

Syncopate and all employees act in accordance with the following principles of behavior:

### CONDUCT TOWARD EMPLOYEES

Syncopate...

- works to protect the health and safety of all our employees by providing knowledge, tools and support.
- acts and communicates honestly, fairly and respectfully.
- provides a supportive work environment, where employees have the opportunity to reach their fullest potential, where employee diversity is valued, and where employees are free from discrimination and harassment.
- protects the privacy of our employees.
- compensates fairly relative to the local marketplace.
- strives to develop the capabilities of our employees to continuously improve our knowledge base, tools, and performance.
- supports teamwork, collaboration, global connectivity, and the sharing of knowledge and experiences.

### EMPLOYEES' CONDUCT TOWARD SYNCOPATE

Our employees...

- comply with this Code of Conduct and adhere to established policies and procedures.
- maintain a safe and healthy workplace by following safety, health and environmental rules, practices, and reporting processes and procedures.
- act in the interests of their colleagues' health and safety.
- individually and collectively keep the workplace free of harassment, intimidation, bias, violence, threatening behaviour and unlawful discrimination.
- do not release or share confidential information, intellectual property and knowledge or Syncopate data without appropriate permission.
- respect the privacy of other employees.
- act in the best interest of Syncopate and if aware of a Code of Conduct violation or a conflict of interest, real or perceived, report the situation to their direct supervisor or in accordance with reporting compliance procedures below.

### CONDUCT WITH CLIENTS AND SUPPLIERS

Syncopate...

- acts in the interests of our clients' and suppliers' health and safety.
- expects suppliers, agents, consortia members, joint venture participants, and subcontractors working with us to behave in a manner consistent with our Code of Conduct and Health and Safety policies.



- only undertakes project assignments when it has the capability to carry out the work either solely or with others.
- endeavors to avoid conflict of interest, both as a company and as individuals, and will inform the client of any known conflict of interest in the execution of our work.
- acts with equity, fairness, courtesy and good faith towards clients, suppliers, and business associates.
- respects client confidentiality provisions in our contracts. Client data is not released or shared without permission, except as required by law.
- encourages our clients to undertake projects in a sustainable manner.

## CONDUCT REGARDING COMPANY ASSETS

Our employees...

- prudently and effectively use funds and resources.
- use assets, supplies and equipment for company business.
- prepare timely, accurate and complete financial accounts and records.
- will not release or share Syncopate's intellectual property or confidential data without appropriate permission.

## CONDUCT TOWARD INDUSTRY

Syncopate...

- competes fairly and offers services on the basis of qualifications and experience.
- when engaged by a client to critically review the work of another professional or firm, informs that professional or other firm of the commission at an appropriate time in accordance with local professional ethical standards and legal requirements.

## CONDUCT AS A MEMBER OF SOCIETY

Syncopate...

- makes a positive difference in our communities and in the environment.
- does not engage in acts of corruption or bribery.
- acts in accordance with applicable existing laws of the countries in which we conduct our work.

## REPORTING COMPLIANCE CONCERNS

If any employee is aware of a situation that they believe may not comply with this Code of Conduct, is unethical, inappropriate or illegal, they should promptly bring it to the immediate attention, in confidence, of their supervisor(s), unless the incident involves the supervisor(s), in which case it should be brought to the attention of the operating company President or Managing Director.

Any employee may, in confidence, report their compliance concern to an external or alternate internal resource; resource contact information can be found at: <https://Syncopate.alertline.com/gcs/welcome>

Syncopate will make every effort to protect the confidentiality of individuals who report real or perceived ethical concerns or violations of the law, and no penalties, sanctions or discrimination will be made against such individuals because of their good faith reporting. Every report will be duly investigated and resolved.